

BAKER DECLARATION

EXHIBIT D

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

THE STATE OF WASHINGTON,)
Plaintiff,)
vs.) No. 3:17-cv-05806-RJB
THE GEO GROUP, INC.,)
Defendant.)

30(B)(6) DEPOSITION UPON ORAL EXAMINATION
OF GEO GROUP, INC.
IN THE PERSON OF
RYAN KIMBLE

9:50 a.m.
July 9, 2018

1250 Pacific Avenue 105
Tacoma, Washington 98401-2317



REPORTED BY: JACQUELINE L. BELLOWS, CCR 2297



APPEARANCES

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1 regarding this topic?

2 A. I have information on the VWP payment
3 protocols.

4 Q. "No. 3, from 2005 to the present, any and all
5 attempts by Geo to increase detainee-worker pay for
6 their participation in the Voluntary Work Program." Do
7 you have regarding this topic?

8 MS. MELL: Again, object to the form to the
9 extent that this implies detainees are ICE employees.
10 Or Geo employee. Excuse me.

11 A. Yes.

12 Q (By Ms. Baker) "No. 4, From 2005 to the
13 present, Geo's practice of paying detainee-workers with
14 food for their labor performed outside of the Voluntary
15 Work Program payment protocols including painting walls,
16 buffing floors, and other types of work compensated with
17 food, hours detainees worked for such compensation, and
18 recruitment practices for work that is compensated in
19 food."

20 MS. MELL: Object to form.

21 Q (By Ms. Baker) Do you have information
22 regarding this topic?

23 A. Can I ask a question on that?

24 Q. Absolutely. Please ask all the clarifying
25 questions that you need.



1 A. Is that saying it was paid in lieu of?

2 Or . . .

3 Q. So the question is information that you have
4 regarding payment of detainees for labor that they have
5 performed at NWDC, either in a dollar a day plus food or
6 just in food or not -- or some other nonmonetary form of
7 compensation.

8 MS. MELL: Object to the form of the question.
9 Mischaracterizes the facts.

10 Q (By Ms. Baker) Do you have information about
11 this practice?

12 A. I have information about the payment, the
13 dollar a day from ICE and . . .

14 MS. MELL: Whether or not this is a correct
15 statement?

16 THE WITNESS: Yes.

17 Q (By Ms. Baker) Do you have information about
18 nonmonetary compensation for detainee labor at the
19 Northwest Detention Center?

20 MS. MELL: Object to the form.

21 A. Nonmonetary compensation? As far as I
22 understand the question, no.

23 Q (By Ms. Baker) Okay. We'll ask in greater
24 detail about that.

25 How long have you been an employee of the Geo



1 Group?

2 A. Right at 10 years.

3 Q. How long have you worked for the Geo Group at
4 the Northwest Detention Center?

5 A. Five years.

6 Q. What positions have you held during your
7 employment with the Geo Group at the Northwest Detention
8 Center?

9 A. The same position I currently hold.

10 Q. What position is that?

11 A. The associate warden of finance and
12 administration.

13 Q. What are your duties and responsibilities as
14 the associate warden?

15 A. Documents and responsibilities include
16 purchasing of anything that the facility needs for
17 security and running of the facility, paying all of the
18 bills, and budgeting for the facility.

19 Q. Thank you. What is the Voluntary Work
20 Program?

21 A. The voluntary Work Program is a program that
22 is an ICE program, administered by the facility for ICE.

23 Q. What happens in this program?

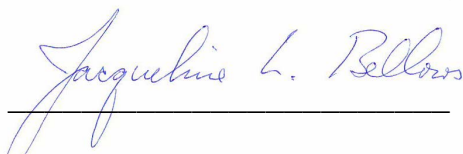
24 A. We follow the ICE protocols and ICE rules on,
25 on giving opportunities for detainees to get out and use



REPORTER'S CERTIFICATE

I, JACQUELINE L. BELLOWS, the undersigned
Certified Court Reporter pursuant to RCW 5.28.010 authorized
to administer oaths and affirmations in and for the State of
Washington, do hereby certify that the sworn testimony
and/or proceedings, a transcript of which is attached, was
given before me at the time and place stated therein; that
any and/or all witness(es) were duly sworn to testify to the
truth; that the sworn testimony and/or proceedings were by
me stenographically recorded and transcribed under my
supervision, to the best of my ability; that the foregoing
transcript contains a full, true, and accurate record of all
the sworn testimony and/or proceedings given and occurring
at the time and place stated in the transcript; that a
review of which was requested; that I am in no way related
to any party to the matter, nor to any counsel, nor do I
have any financial interest in the event of the cause.

WITNESS MY HAND AND DIGITAL SIGNATURE this
27th day of July, 2018.



Jacqueline L. Bellows
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